## EXHIBIT B

BIG LOTS, INC. *et al.*Bankruptcy Case No. 24-11967 (JKS) **Second Amended**<sup>1</sup> Adequate Assurance Objections

## **Adequate Assurance Objections**

- 1. Objection to Cure Amount and to Assumption and Assignment of Lease (<u>D.I. 625</u>, filed 10/28/24).
- 2. Objection of Lafayette Place OMV, LLC to Debtors' Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount (D.I. 681, filed 10/31/24).
- 3. Lease Sale and Adequate Assurance Objection of Gratiot, LLC Relating to Debtors Store Located at Gratiot Shopping Center in Chesterfield MI (D.I. 682, filed 10/31/24).
- 4. Lease Sale and Adequate Assurance Objection of JHR Summer Place Shopping Center, LLC Relating to Debtor's Store Located at Summer Place Shopping Center in Gallatin, TN (D.I. 696, filed 10/31/24).
- 5. Lease Sale and Adequate Assurance Objection and Cure Amount Objection of Colony Marketplace Tenancy in Common Relating to Debtor's Store Located at 500 Main Street in the Colony, TX (D.I. 726, filed 10/31/24).
- 6. Limited Objection by 1600 Eastchase Parkway Leasing LLC, to Debtors' Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount (D.I. 791, filed 11/1/24).
- 7. Oracle's Limited Objection To and Reservation of Rights Regarding Debtors' Sale Motion and Related Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount (D.I. 793, filed 11/1/24).
- 8. 2310 Saunders, LLC's Limited to Assumption and Assignment of Lease and Notice of Proposed Cure Amount for Certain Unexpired Lease and Reservation of Rights (<u>D.I. 797</u>, filed 11/1/24).
- 9. Conroad Associates, LP's Joinder in Motion to Compel Immediate Payment of Stub Rent in Accordance with Bankruptcy Code Section 503(B) and Joinder and Objection to Orders for (I) Store Closing Procedures and (II) Post Petition Financing and Orders Authorizing the Debtors to (A) Obtain Senior Secured Superpriority Post-Petition Financing and (B) Use Cash Collateral, Etc. and Filing Assumption and Assignment Objections (D.I. 803, filed 11/1/24).

<sup>&</sup>lt;sup>1</sup> Amended items appear in **bold**.

- 10. Objection of Southgate Shopping Center LLP to Debtors' Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount (<u>D.I. 807</u>, filed 11/1/24).
- 11. Limited Objection of Town N' Country Plaza, LLC f/k/a Town N' Country Plaza, L.P. to Debtors' Proposed Assumption and Assignment of Lease, Including Cure Amount, and Reservation of Rights (D.I. 808, filed 11/1/24).
- 12. Lease Sale and Adequate Assurance Objection of Westchase Series 8, a Series of Westchase Partners, LLC Relating to Debtor's Store Located at Summer Place Shopping Center in Gallatin, TN (D.I. 810, filed 11/1/24).
- 13. The Brandon, Florida Landlord's Limited Objection to Cure Notice and Reservation of Rights (D.I. 817, filed 11/3/24).
- 14. The Marietta, Ohio Landlord's Limited Objection to Cure Notice and Reservation of Rights (D.I. 818, filed 11/3/24).
- 15. The Plant City, Florida Landlord's Limited Objection to Cure Notice and Reservation of Rights (D.I. 819, filed 11/3/24).
- 16. The Fifth Avenue, Columbus, Ohio LLC's Limited Objection to Cure Notice and Reservation of Rights (D.I. 820, filed 11/3/24).
- 17. Landlord's Limited Objection to Cure Notice and Reservation of Rights (<u>D.I. 821</u>, filed 11/3/24).
- 18. Big Mifl2 Owner LLC's Objection and Reservation of Rights to (I) Third Notice of (A) Bid Deadline, (B) Sale Hearing and (C) Potential Assumption and Assignment of Certain Unexpired Leases Filed by the and (II) to the Scheduled Amount (D.I. 823, filed 11/4/24).
- 19. Big Mifl2 Owner LLC's Objection to Scheduled Cure Amount (D.I. 827, filed 11/4/24).
- 20. Amended Objection to Cure Amount and to Assumption and Assignment of Lease (D.I. 832, filed 11/4/24).
- 21. Objection to the Debtors' Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount (D.I. 833, filed 11/4/24).
- 22. The Circleville, Ohio Landlord's Limited Objection to Cure Notice and Reservation of Rights (D.I. 835, filed 11/4/24).
- 23. The Delaware, Ohio Landlord's Limited Objection to Cure Notice and Reservation of Rights (D.I. 836, filed 11/4/24).

- 24. The Grove City, Ohio Landlord's Limited Objection to Cure Notice and Reservation of Rights (D.I. 837, filed 11/4/24).
- 25. The Lancaster, Ohio Landlord's Limited Objection to Cure Notice and Reservation of Rights (D.I. 838, filed 11/4/24).
- 26. The Sawmill Dublin Landlord's Limited Objection to Cure Notice and Reservation of Rights (D.I. 840, filed 11/4/24).
- 27. Limited Objection of Sun Point SDC, LLC to Debtors' Proposed Assumption and Assignment of Lease, Including Cure Amount, and Reservation of Rights (<u>D.I. 841</u>, filed 11/4/24).
- 28. Limited Objection of Dell Financial Services L.L.C. to Notices of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount (<u>D.I. 842</u>, filed 11/4/24).
- 29. Limited Objection of Lee's Crossing SDC, LLC to Debtors' Proposed Assumption and Assignment of Lease, Including Cure Amount, and Reservation of Rights (D.I. 844, filed 11/4/24).
- 30. Limited Objection of Beauclerc SDC, LLC to Debtors' Proposed Assumption and Assignment of Lease, Including Cure Amount, and Reservation of Rights (D.I. 845, filed 11/4/24).
- 31. Cure Claim Limited Objection Related to Debtors' Notice of Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases and Cure Amounts [Docket No. 511] and Reservation of Rights (D.I. 856, filed 11/4/24).
- 32. Objection to Debtors' Stated Cure Amounts (D.I. 857, filed 11/4/24).
- 33. The Keller, Texas Landlord's Limited Objection to Cure Notice and Reservation of Rights (D.I. 859, filed 11/4/24).
- 34. Objection and Reservation of Rights of Milelli Realty-Lehigh Street, LLC to Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount (D.I. 860, filed 11/4/24).
- 35. CORTA Stevens Point, LLC's Limited Objection to Assumption and Assignment of Lease and Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amounts (D.I. 869, filed 11/4/24).
- 36. Limited Objection to Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount (D.I. 872, filed 11/4/24).

- 37. Limited Objection of Kimco Landlords to Notice of Potential Assumption of Executory Contracts, Unexpired Leases and Cure Amounts (<u>D.I. 881</u>, filed 11/4/24).
- 38. Limited Objection of The Grove Shops LLC to the Debtors' Notice of Potential Assumption and Assignment of Executory Contracts and Unexpired Leases and Cure Amount (D.I. 888, filed 11/4/24).
- 39. Limited Objection to Proposed Assumption and Assignment of Lease (D.I. 901, filed 11/5/24).
- 40. Collin Creek Associates, LLC's Objection to Notice of (I) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases and (II) Cure Amounts (ECF No. 511) (D.I. 902, filed 11/5/24).
- 41. Objection and Reservation of Rights of WPG Legacy, LLC to the (I) Notice of Proposed Assumption and Assignment of Executory Contracts or Unexpired Leases and Proposed Cure Amount and (II) Proposed Sale to the Successful Bidder (D.I. 907, filed 11/5/24).
- 42. Limited Objection of Walnut Creek Plaza, LLC to the Debtors' Sale Motion and Assumption and Assignment Notice (D.I. 909, filed 11/5/24).
- 43. Limited Objection and Reservation of Rights of The Stop & Shop Supermarket Company LLC and Food Lion LLC to Debtors' Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount (D.I. 910, filed 11/5/24).
- 44. Limited Objection of 1255 Sunrise Realty, LLC and 4101 Transit Realty LLC to Debtors' Proposed Assumption and Assignment of Unexpired Leases (D.I. 911, filed 11/5/24).
- 45. Objection and Reservation of Rights of Brunswick MZL, LLC, Chili MZL, LLC, G&I X Trexler Town MZL, LLC and Jacksonville MZL, LLC to Debtors' Notice of Proposed Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amounts (D.I. 914, filed 11/5/24).
- 46. Objection of Southgate Shopping Center LLP to Debtors' Notice of Proposed Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amounts (<u>D.I. 915</u>, filed 11/5/24).
- 47. Objection and Reservation of Rights of Divisions, Inc. to: (I) the Notice of (A) Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and (B) Cure Amounts; and (II) the Proposed Sale (D.I. 921, filed 11/5/24).
- 48. Limited Objection of Tejas Corporation to Proposed Assumption and Assignment of Lease and Cure Costs (D.I. 932, filed 11/6/24).
- 49. ROF Grandville LLC, New Port Richey Development Company LLC, and Yukon Route 66 II, LLC's Limited Objection and Reservations of Rights to Debtors' Notice of Potential

- Assumption and Assignment of Executory Contracts or Unexpired Leases (D.I. 934, filed 11/6/24).
- 50. Objection and Reservation of Rights of Tempur Sealy International, Inc. to the (I) Notice of Proposed Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount and (II) Proposed Sale (D.I. 937, filed 11/6/24).
- 51. Objection and Reservation of Rights of Tropicana Palm Plaza LLC with Respect to Debtors' Notices of Potential and Proposed Assumption and Assignment of Executory Contracts or Unexpired Leases, Cure Amount, and Adequate Assurance (D.I. 938, filed 11/6/24).
- 52. Limited Objection of CNSC, LP to Debtors' Proposed Assumption and Assignment of Unexpired Leases (D.I. 939, filed 11/6/24).
- 53. Objection of Darnestown Road Property Limited Partnership to Notice of Proposed Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amounts (D.I. 941, filed 11/6/24).
- 54. Limited Objection and Reservation of Rights of Kin Properties Inc. and its Affiliated Landlords to Debtors' Notice of Potential and Proposed Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amounts in Connection with Proposed Stalking Horse Sale of Substantially all of Debtors' Assets (D.I. 942, filed 11/6/24).
- 55. Objection of 2413 Brewerton Road Plaza LLC, Benenson Capital Partners, LLC, CRI New Albany Square LLC, DLC Management Corporation, Gibraltar Management Co., Inc., National Realty & Development Corp., Rivercrest Realty Associates, LLC, and Wheeler REIT, LP to Proposed Lease Assumptions/Assignment and Reservation of Rights with Respect to the Sale Aspect of the Sale/Bid Procedures Motion (D.I. 945, filed 11/6/24).
- 56. Limited Objection and Reservation of Rights of Shops at Hartsville DE, LLC to Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount (D.I. 946, filed 11/6/24).
- 57. Engie's Limited Objection and Reservation of Rights with Respect to Notice of Proposed Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amounts (D.I. 952, filed 11/6/24).
- 58. Objection and Reservation of Rights of Ramsey Pike, LLC to the (I) Notice of Proposed Assumption and Assignment of Executory Contracts or Unexpired Leases and Proposed Cure Amount and (II) Proposed Sale to Successful Bidder (D.I. 953, filed 11/6/24).
- 59. Objection and Reservation of Rights of BancKentucky, Inc. to the (I) Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Proposed Cure Amount and (II) Proposed Sale of Substantially All of the Debtors Assets (D.I. 954, filed 11/6/24).

- 60. Limited Objection and Reservation of Rights to Notice of Proposed Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amounts (<u>D.I. 955</u>, filed 11/6/24).
- 61. Limited Objection to Debtors' Notice of Potential Assumption and Assignment of Executory Contracts and Unexpired Leases and (II) Cure Amounts (D.I. 956, filed 11/6/24).
- 62. Foothill Luxury Plaza LLC's Objection to Notice of (I) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases and (II) Cure Amounts (ECF No. 511) (D.I. 957, filed 11/6/24).
- 63. Show Low Yale Casitas, LLC's Limited Objection to Assumption and Assignment of Lease and Notice of Proposed Cure Amounts for Certain Expired Leases (D.I. 958, filed 11/6/24).
- 64. Objection of North Oak Marketplace 07 A, LLC and North Oak Marketplace 18 B, LLC to Debtors' Notice of Proposed Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amounts (D.I. 964, filed 11/6/24).
- 65. Limited Objection of Marshall Realty Company, Successor by Merger to The Deerfield Company, Inc., to Debtors' Notice of Proposed Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amounts (D.I. 968, filed 11/6/24).
- 66. Limited Objection of River Oaks Properties, Ltd. and ROP North Hills, LLC to Proposed Assumption and Assignment of Leases (D.I. 969, filed 11/6/24).
- 67. Objection of Certain Landlords to Debtors' Proposed Cure Amounts and Assumption and Assignment of Certain Leases (D.I. 970, filed 11/6/24).
- 68. Objection of Morgan Britton LLC to Assumption and Assignment of Lease and Notice of Proposed Cure Amount for Unexpired Lease and Reservation of Rights (<u>D.I. 971</u>, filed 11/6/24).
- 69. Objection of Landlord Mesila Valley Businss Partners, LLC to Debtors' Proposed Assumption and Assignment and Cure Cost Estimate, and Reservation of Rights (D.I. 973, filed 11/6/24).
- 70. Objection of Y&O Companies to Debtors' Cure Amount Notice, et al. (D.I. 974, filed 11/6/24).
- 71. Objection of Landlord Cielo Paso Parke Green, LP to Debtors' Proposed Assumption and Assignment of Lease and to Debtors' Cure Cost Estimate and Reservation of Rights (D.I. 975, filed 11/6/24).

- 72. Limited Objection of Harolds Heirs LLC to Notice of Potential Assumption an Assignment of Executory Contracts or Unexpired Leases and Cure Amounts (D.I. 976, filed 11/6/24).
- 73. Objection of Landlord Pleasanton Partners, L.P. to Debtors' Proposed Assumption and Assignment and Cure Cost Estimate, and Reservation of Rights (D.I. 979, filed 11/6/24).
- 74. Limited Objection of Boone Investment Group, LLC to Debtors' Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount (D.I. 980, filed 11/6/24).
- 75. Objection of United Properties Corp. et al. to Proposed Cure Amounts Listed by Debtors for the Assumption and Assignment of Real Property Leases (D.I. 982, filed 11/6/24).
- 76. Objection and Reservation of Rights of Kroger Limited Partnership I to the (I) Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Proposed Cure Amount and (II) Proposed Sale of Substantially all of the Debtors' Assets (D.I. 983, filed 11/6/24).
- 77. Limited Objection and Reservation of Rights of Capteris, LLC to the Notice of Proposed Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amounts (D.I. 991, filed 11/6/24).
- 78. Objection of Cambridge Investment Inc. to the Potential Assumption and Assignment of Lease and Proposed Cure Amount (D.I. 995, filed 11/6/24).
- 79. Limited Objection and Reservation of Rights of Commodore Realty, Inc. as Property Manager for Venice Plaza, Ltd. With Respect to Proposed Assumption and Assignment of Lease for Premises at 565 U.S. 41 Bypass North, Venice, FL, 34285 (D.I. 1005, filed 11/6/24).
- 80. Amended Objection of Y&O Companies to Debtors' Cure Amount Notice, et al. (D.I. 1007, filed 11/6/24).
- 81. Informal comments from CFT NV Developments, LLC.
- 82. Informal comments from 1100 Jefferson Partners LLC and Spoleta 110 Jefferson LLC.
- 83. Informal comments from Morgan Britton LLC.
- 84. Informal comments from GPR Investments LLC.
- 85. Informal comments from Levin Properties L.P.
- 86. Informal comments from 1255 Sunrise Realty, LLC.
- 87. Informal comments from Walnut Creek Plaza, LLC.
- 88. Informal comments from Regency Commercial Associates LLC and its Affiliates.

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- 89. Informal comments from American National Insurance Company.
- 90. Informal comments from ILF-Cherry Hill, LLC.
- 91. Informal comments from Aston Properties.
- 92. Informal comments from Benenson Capital Partners.
- 93. Informal comments from Crestview Corners, LLC.
- 94. Informal comments from Allegheny Plaza Associates I Limited Partnership.
- **95.** Limited Cure Objection and Reservation of Rights of Realty Income Corporation to the Debtors' Notice of Proposed Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amounts (D.I. 1030, filed on 11/7/24).